

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

TONYA MANGELS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:19-cv-00834-BP
)	
AMERICAN MULTI-CINEMA, INC.,)	
)	
Defendant.)	

NOTICE OF VIDEOTAPED DEPOSITION *DUCES TECUM*

PLEASE TAKE NOTICE that at **9:00 a.m.** on **December 3, 2020**, at OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C., 4520 Main Street, Suite 400, Kansas City, MO 64111, counsel for Plaintiff will take the deposition of **MICHAEL PURSELL** before a notary public or other officer authorized by law to administer oaths. The deposition will be recorded by audiovisual and stenographic means by a court reporter and videographer certified to record depositions, and is intended to be used for all lawful and proper purposes, including use at trial as evidence. The deposition will begin on the date and time listed above and will continue from time to time until completed. Plaintiff will use the following provider(s) for audiovisual and stenographic services: Christopher Video & Reporting, 1100 Main Street, Suite 2190, Kansas City, MO 64105, 816-471-7800, <http://www.cvandr.com>.

DUCES TECUM REQUESTS

You are requested to produce the following documents and things at the time of the deposition:

1. All documents not already produced to date that the witness intends to reference, discuss, and/or rely upon while testifying.
2. All documents and things not already produced to date that the witness utilized to refresh their recollection in relation to any of the facts or allegations referenced in Plaintiff's Complaint or AMC's Answer.

Respectfully submitted,

BEAVER LAW FIRM, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2020, a copy of the above and foregoing document was served by:

- ☒ Filing it with the Court's CM/ECF system;
- ☐ U.S. Mail, postage-prepaid;
- ☐ Facsimile;
- ☐ Email;
- ☐ Federal Express; and/or,
- ☐ Hand delivery, upon:

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